

AR201-13670



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Hynes, Dawn" <Dawn.Hynes@siigroup.com> 04-02-2002 03:10:08 PM

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To: Rtk Chem/DC/USEPA/US@EPA, NCIC OPPT/DC/USEPA/US@EPA  
cc:

Subject: HPV Re-Submittal

Dear Sir/ Madam;

Following, please find our Re-submission of Robust Summaries and Test Plan for  
Registration Number

The attached .pdf files contain:

Cover letter

Title Page and Table of Contents

Section One - Development of Categories and Test Plans

Section Two - Ortho-substituted Mono-alkylphenols Robust Summaries

Section Three - Para-substituted Mono-alkylphenols Robust Summaries

Section Four - Di- and Tri-substituted Mixed Alkylphenols Robust Summaries

<<Coverletter.pdf>> <<Titlepage&TableofContents.pdf>> <<Section1.pdf>> <<Section2.pdf>>  
<<Section3.pdf>> <<Section4.pdf>>

I have also sent a hard copy and an electronic version via US Mail to Administrator  
Whitman.

If you have any problem accessing the attached files, please contact me.

Thank you.

Sincerely,

Dawn Hynes

Dawn E. Hynes

Manager, Toxicology and Regulatory Affairs

Schenectady International, Inc. - Chemical Division

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Coverletter.pdf



Titlepage&TableofContents.pdf



Section1.pdf



Section2.pdf



Section3.pdf



Section4.pdf

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April 1, 2002

Ms. Christie Whitman, Administrator  
US Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attn: Chemical Right-to-Know Program

**RE: Robust Summary and Test Plan for Registration Number**

Dear Ms. Whitman:

In accordance with our continuing commitment to the HPV Challenge Program (AR-201), Schenectady International, Inc. (SII), is re-submitting herewith the Robust Summaries and Test Plan for seventeen alkylphenols. The identity of these materials can be found in the Table of Contents following the cover page. The original Robust Summaries and Test Plan submission was dated April 13, 2001 and was posted on EPA's Chemical RTK Website on May 18, 2001. The revisions are primarily in response to EPA's comments dated November 15, 2001 and posted on EPA's Chemical RTK Website on November 29, 2001.

We appreciate and value EPA's comments, and therefore have reviewed and revised our robust summaries and test plan. Where possible, we have revised our documents in accordance with EPA's comments and suggestions. In many cases, the IUCLID and SIDS documents referenced did not contain the level of detailed information sought by the agency. However, we believe the information contained in SIDS and IUCLID should be acceptable to the Agency, as indicated in EPA Guidance Documents. In addition to the suggested revisions, more recent test data have been included, where available.

We conducted a re-examination of our category justification through our chemists and other experts, and have sub-divided the single alkylphenol category into three sub-categories: ortho-substituted mono-alkylphenols, para-substituted mono-alkylphenols, and di- and tri- substituted mixed alkylphenols. Included for your review are four additional papers, cited in Section One, which further justify the main category and our decision to sub-divide them as presented in this document.

For the physicochemical endpoints (vapor pressure, water solubility, Log Kow, etc.), SII appreciates EPA's preference for measured data for the majority of endpoints. We have initiated a program to acquire the experimental data for previously calculated endpoints. In the case of environmental fate data, while we appreciate that EPA suggests Level III

Fugacity Modeling, we propose not to go beyond Level I at this time, as per Section 6.2 in EPA's Guidance Document "Determining the Adequacy of Existing Data (2/10/99 rev.)".

Where possible, SII has made the revisions suggested by EPA in the robust summaries for mammalian toxicity, environmental fate, and aquatic toxicity endpoints. We have also added more recent test data and supplemented the previously provided information, where possible. We have denoted revisions suggested by EPA by shading the text in gray and indicated additions by marking them "ADDITION" at the beginning of the appropriate section.

The Robust Summaries and Test Plan are provided hard copy in a binder. In addition to the hard copy report, we have provided the entire document as Adobe Acrobat (pdf) files on the enclosed disk and have electronically transmitted the same to [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov) and [oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov).

After your staff has reviewed the re-submittal herein, we request the opportunity for a technical discussion with the appropriate EPA representatives to discuss our test plan and supporting documentation. Any remaining details for progress forward can be discussed at that time.

If you have questions or comments regarding this re-submittal, please contact me at the address shown above, by telephone at 518-347-4512, by FAX at 518-382-5417 or via email at [dawn.hynes@siigroup.com](mailto:dawn.hynes@siigroup.com).

Very truly yours,

Dawn E. Hynes  
Manager, Toxicology and Regulatory Affairs

ENCLOSURE

## **Alkylphenols Category**

Chemical Right-to-Know Initiative

### **HPV CHALLENGE PROGRAM**

Submitted to US EPA by:  
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